

HENRY L. KIM*
JOSHUA S. LIM*
KENDAL SIM*
SEAN S. KWAK*
JOHN CHEN*

OF COUNSEL
NICHOLAS J. DUBOIS*
CRAIG A. BORGENT**



KIM, CHO & LIM, LLC
Attorneys at Law

NY Office:
164-01 Northern Boulevard
2nd Floor
Flushing, NY 11358
F: 877.833.2007

Reply to NJ Address only

460 Bergen Boulevard, Suite 305, Palisades Park, NJ 07650
T: 201.585.7400 F: 201.585.7422

* Admitted in NJ & NY
** Admitted in CA, NJ, NY & PA
♦ Certified by the Supreme Court
of New Jersey as a Civil Trial Attorney

January 16, 2023

Via ECF

Southern District of New York
Attn: Hon. Jennifer L. Rochon, U.S.D.J.
500 Pearl Street, Courtroom 20B
New York, New York 10007

**RE: HYUNHUY NAM v. PERMANENT MISSION OF THE REPUBLIC OF KOREA TO
THE UNITED NATIONS, et al.
CASE NO.: 1:21-cv-6165-JLR
REQUEST FOR AN EXTENSION OF TIME TO SUBMIT PAPERS**

Dear Judge Abrams:

As Your Honor is aware, this firm represents the remaining Defendant, the Permanent Mission of the Republic of Korea to the United Nations (“Defendant”), in the above-referenced matter. We write with the consent of counsel for Plaintiff to request an extension of a deadline set forth in Your Honor’s January 3, 2023 Order (DE#96).

Your Honor had ordered the parties to submit further briefing concerning Plaintiff’s approximate alleged damages, Plaintiff to submit his papers by January 13, 2023 and Defendant to submit its response by January 20, 2023. To date, Plaintiff has submitted his papers.

As Your Honor may be aware, Defendant is a subdivision of the government of the Republic of Korea, and its submissions must be reviewed by the government before filing with the Court. Moreover, while the Defense counsel will endeavor to complete its draft as soon as possible, the Korean government would be unable to review the submission next week due to its celebration of the Chinese New Year.¹

For the foregoing reasons, Defendant respectfully requests that the deadline for Defendant’s submission as set forth in Your Honor’s January 3, 2023 Order be extended from the original date of January 20, 2023 to a new date of February 3, 2023. There have been no previous extensions requested or granted for this deadline, and Plaintiff’s counsel consent to the foregoing request.

Thank you, Your Honor, for your time and attention in this matter.

¹ Of course, Koreans do not call it the “Chinese” New Year, but it is a national holiday in Korea.

Respectfully yours,

/s/ Sean S. Kwak

Sean S. Kwak